

Attorneys for Defendant
LAP THE CHUNG

UNITED STATES OF AMERICA,)	No. CR 11-0097 CRB
)	
Plaintiff,)	
)	
v.)	STIPULATION AND [proposed]
)	ORDER TO PERMIT DEFENDANT
LAP THE CHUNG,)	LAP THE CHUNG TO TRAVEL IN
)	EASTERN DISTRICT OF
Defendant.)	CALIFORNIA

Mr. Chung wishes to travel with his wife and children during the children's spring break in mid-March 2012 to the Eastern District of California to visit family and friends. Mr. Chung's Pretrial Services Officer, Paul Mamaril, informed undersigned counsel for Mr. Chung that he has no objection to permitting Mr. Chung to travel to the Eastern District of California, so long as he informs him in advance of the dates of his travel and the place where he will stay.

The parties STIPULATE that this Court may modify the conditions of Mr. Chung's pretrial release to permit him to travel in the Northern and Eastern Districts of California, so long

1 as he obtains advance approval from Pretrial Services for any travel into the Eastern District of
2 California.

3 IT IS SO STIPULATED.

4 DATED: April 9, 2012

/s/
Robert Rees
Assistant United States Attorney

7 DATED: April 9, 2012

/s/
Scott A. Sugarman
Attorney for Lap The Chung

10 SO ORDERED.

11 DATE: April 9, 2012



UNITED STATES MAGISTRATE JUDGE